

February 9, 2023

Via ECF

Hon. Christian Hummel
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207

Re: *Yeend et al. v. AGS*, No. 20-cv-01281

Your Honor,

Together with Worker Justice Center New York, we represent Plaintiffs in this case and write jointly with Defendant to respectfully request an extension of the discovery deadlines. Currently, fact discovery is set to close on February 24, 2023 (Dkt. #79). The parties respectfully request at least a six-month extension of discovery.

Plaintiffs filed their Amended Complaint, adding new plaintiffs and class action claims, on September 8, 2022. In the time since, the parties have engaged in written discovery, which continues. The parties are preparing to schedule depositions, as well. Defendants are engaged in ongoing efforts with ICE about whether and how best they can produce responsive documents.

Plaintiffs have also sought responsive documents directly from the Department of Homeland Security, through a *Touhy* request and subpoena, and we are in the process of working through those issues with DHS directly.

Accordingly, we respectfully request that fact discovery be extended by at least six months, to October 23, 2023.

Respectfully submitted,

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